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Environment Management Services

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May 16, 2005

Ms. Paula Estornell, PE
NPDES Team Leader,
DC/MD/VA Branch - Water Protection Division
EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103 - 2029

Re: **PEPCo's Benning Generating Station
Renewal of NPDES Permit No. DC0000094**

Dear Ms. Estornell:

Potomac Electric Power Company (Pepco) submits herewith an application to renew the Benning Generating Station NPDES Permit. The application consists of EPA Forms 1, 2C and 2F.

Please be advised as follows:

1. Form 2C - Sampling at Outfall 013

All internal discharges and power plant process water including non contact cooling water is discharged to the 54 inch diameter storm drain pipe that carries the flow to outfall 013 for ultimate discharge to the Anacostia River (See Attachment 7 - Benning Facility Drainage Area Map). Thus, discharges from outfall 013 are representative of final effluent to the Anacostia River. Samples were collected from outfall 013 on April 27, 2005 and the analytical results are reported on Part V-A and V-B of the application. Discharges from all other outfalls at the facility are storm water discharges. No storm water sample was collected from these outfalls due to lack of a qualifying storm event (see Item 2 below for further explanation).

2. Form 2F - Sampling of Storm Water Outfalls

Pepco was unable to collect samples from the storm water outfalls due to lack of a qualifying storm event. In accordance with the sampling instructions of Form 2F, the qualifying event is an event that is greater than 0.1 inches and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. Storm water samples

will be collected from the next qualifying event and analytical data will be forwarded to your office.

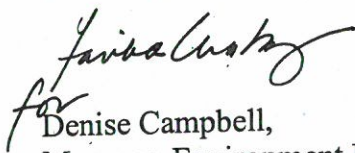
Enclosed, however, are the results of storm water samples collected in 2004 from four permitted storm water outfalls 013, 401, 402, and 416 (Attachment 12). The NPDES permit, Part A indicates "samples shall be taken during the periods of January through March, April through June, July through September, and October through December." However, in 2004, due to lack of qualifying storm events or unexpected storm events, none of the storm water samples were collected during the specified periods indicated above. Part.C.2.A of the NPDES permit indicates "when the permittee is unable to collect samples within a specified sampling period due to adverse climatic conditions, the permittee shall collect a substitute sample from a separate qualifying event in the next period and submit the data along with a description of the adverse conditions and the data for the routine sample in that period." Thus, substitute samples were collected for the first, second and third quarters of 2004 and the results are enclosed. The collection of storm water samples for the fourth quarter 2004 is still pending since no qualifying storm event occurred in the fourth quarter 2004, nor in the first quarter 2005.

3. Removal of Monitoring Point 010

Pepco requests the removal of Monitoring Point 010 from the permit. The MP 010 requires monitoring of discharges from the drying pit for Flow, pH, Oil and Grease, TSS and PCB. The drying pit is used for temporary holding of decanted water from the Vac Trucks that transport manhole sludge to Benning prior to off-site disposal. The decanted water is then pumped to the oil/water separator for treatment. There is no discharge from the drying pit. The drain pipe from the pit to the facility's 54 inch storm drain pipe has been capped and locked for the past several years.

Please contact me at (202) 331-6640 or Fariba Mahvi at (202) 331-6641 if any additional information is required.

Sincerely,


for Denise Campbell,

Manager, Environment Management Services

cc: Ms. Mary Letzkus (3WP13) - EPA Region III

Enclosures